

REGISTRATION, SUBSCRIPTION AND STATISTICAL SERVICE
BOY SCOUTS OF AMERICA

APPENDIX A

DATE January 14, 1987

FULL NAME Ralph Randolph Staten SOCIAL SECURITY NUMBER [REDACTED]
(No initials if you can possibly get full name)

Home of Record

ADDRESS _____

CITY Baltimore STATE MD ZIP CODE _____

DATE OF BIRTH Sept. 16, 1952 (This is important and should be exact)

APPROXIMATE AGE 35-38 (To be used ONLY when date of birth is not known)

RELIGION Roman Catholic NATIONALITY American

OCCUPATION Professional Soldier

EDUCATION Mervin Tec High School N.D. - Graduate

WEIGHT 6' + HEIGHT _____ RACE Negro

COLOR OF HAIR Black COLOR OF EYES _____

OUTSTANDING CHARACTERISTICS OR INTERESTS thin mustache, light skinned volunteer as basketball, basketball
soccer coach - 11 yrs

MARRIED OR SINGLE Single CHILDREN _____
(Number, ages, and names, if possible)

NAME OF SPOUSE _____

SCOUTING CONNECTIONS:

UNIT #	CITY	STATE	POSITION	DATE REGISTERED	DATE RESIGNED
388	Columbia	SC	SM	1983	
	Ft Hood	TX		1977, 1979	
	Giesse (?)	Germany		1976-77, 1978-79, 1980-1983	

SPECIAL RECOGNITION 1984 - TRADOC - Outstanding Volunteer. Many others 1-17-80 / 1-12-83
for various sports, each season

SUSPENDED OR DENIED REGISTRATION FOR FOLLOWING REASONS:

SPECIFY THE FACTS WHICH LEAD YOU TO RECOMMEND DENIAL OF REGISTRATION AND LIST ATTACHED SUPPORTING DOCUMENTS (STATE ONLY KNOWN FACTS, NOT RUMOR, CONJECTURE OR SPECULATION):

CONFIDENTIAL

291987

NOTED

AUG 14 '87

JOSEPH L. ANGLIM

F. STARON
RS-509

4/14/83-nah

Signed _____
SCOUT EXECUTIVE

Council _____

CONF013185

October 31, 1989

READY FOR FILE

NOV 01 1989

JULIE EATON

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL AND CONFIDENTIAL

SUBJECT: RALPH R. STATEN

Dear Jim:

Thank you for the material you recently sent, concerning the above named individual. This is most helpful to us, so that we have a complete file.

I presume you have already discussed this matter with Dave Park our Corporate Attorney. If you have not done so, I would suggest you do so immediately, so that he can help you with this case.

Please do not hesitate to contact me if I may be of further service.

Sincerely,

Paul Ernst, Director
Registration Service

jf

cc: Southeast Region

CONF013186

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ORIGINAL FILED

OCT 18 1989

ANN A. BIRCH, CLERK
COLUMBIA, S. C.

[REDACTED], legal)
guardian of [REDACTED])
a minor over the age of)
fourteen years, and others)
similarly situated,)

Plaintiffs,)

vs.)

Indian Waters Council, Inc.,)
Boy Scouts of America, Inc.,)
Karen Ellis, Ralph Staten,)
unknown BEQ Battalion)
Sergeant Major, unknown)
Brigade Sergeant Major,)
unknown Brigade Commander of)
the United States Army,)

Defendants.)

ANSWERS TO RULE 16(b)
INTERROGATORIES

3 89-2540-6

TO: Defendants above-named:

The Plaintiffs, through their undersigned attorney, do hereby submit the following Answers to Interrogatories under Rule 16(b) of the Federal Rules of Civil Procedure.

A. State with particularity what you contend Defendants did, or failed to do, which entitles you to obtain the relief you seek in this action?

Prior to gaining his majority Plaintiff was a boy scout under the supervision and control of the Defendants during scouting activities and while upon Fort Jackson. While under the Defendants' custody, care and control, the Plaintiff was instructed by the Defendant Staten, acting on behalf of the other Defendants, to engage in certain activities including the removal of the Plaintiff's clothing, the

touching of the Plaintiff's body, and the insertion of objects into the Plaintiff's body. These activities have caused the Plaintiff enormous emotional trauma which continues to disturb him mentally.

B. Describe in detail all laws, acts having the force and effect of laws, code, regulations and legal principles, standards and customs of usage, which you contend are applicable to this action?

Plaintiffs contend that the Defendants have violated the common laws of the State of South Carolina respecting negligence, contract, battery, and other causes of action. Plaintiffs contend their rights under the United States Constitution have been violated and that they are entitled to redress.

More specifically, the Plaintiffs cite the authority of the following cases:

- a. Bivens vs. Six Unknown Named Agents of the Federal Bureau of Narcotics, 43 U.S. 388, 29 L.Ed.2d 619, 91 S.Ct. 1999 (1971) authorizing the recovery of damages from Federal agents for violation of Fourth Amendment rights;
- b. Carlson vs. Green, 446 U.S. 14, 64 L.Ed.2d 15, 100 S.Ct. 1468 (1980), allowing recovery against Federal

allowing recovery against Federal
officers for Constitutional
invasions;

C. State the full names, addresses, and telephone
numbers of all witnesses whose testimony you may use at the
trial of this case and describe the issues to which that
testimony may relate?

a. [REDACTED]

Columbia, South Carolina;

1. [REDACTED] will testify as to
the issues of liability and
damages.

b. [REDACTED]

Columbia, South Carolina
[REDACTED]

1. [REDACTED] will testify as to
the issues of liability.

c. [REDACTED]

address unknown;

1. [REDACTED] will testify
concerning the issues of
liability.

D. Identify by full names, address, and telephone
number each person whom you expect to call as an expert
witness at the trial of this case, and, as to each expert so
identified, state the subject matter on which he is expected

to testify, the substance of the facts and opinions to which he is expected to testify, and the summary for the grounds of each opinion.

1. Plaintiff expects to
utilize the testimonies of
a licensed psychiatrist or
psychologist, who has not
yet been chosen, to
testify concerning the
psychological damages
caused the Plaintiff as a
result of the experiences
he endured

E. If you contend that you have been injured or damaged, describe said injuries and damages in detail and list the elements of damages for which you contend you are entitled to recover and the measure by which you contend the same should be computed.

1. Emotional distress - One
million dollars
(\$1,000,000.00).
2. Public humiliation and
embarrassment - One
Million dollars
(\$100,000.00).

3. Medical and psychological expenses in an amount as yet undetermined.
4. Physical pain and suffering - Fifteen thousand dollars (\$15,000.00).
5. Injury to reputation and standing - One million dollars (\$1,000,000.00).
6. Future emotional distress - One million dollars (\$1,000,000.00).
7. Future public humiliation and embarrassment - Five-hundred thousand dollars (\$500,000.00).
8. Future medical and psychological expenses and an amount is yet undetermined.
9. Reduced earning capacity - One hundred thousand dollars (\$100,000.00).
10. Future damages of reputation - Five-hundred

thousand dollars
(\$500,000.00).

11. Future and permanent
mental and emotional
impairment and disability
-Two million dollars
(\$2,000,000.00).

F. State the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in your complaint, and state the basis and extent of said interest.

None.

G. Outline in detail the discovery you anticipate you will pursue in this case and state the time you estimate it will take you to complete each item of same, along with an explanation of how you compute said times.

Plaintiff intends to serve interrogatories upon the Defendants after having received Defendants' answers and Rule 16(b) Answers to Interrogatories. Plaintiff estimates this will take some three months, allowing time for service and answering.

After receipt of all interrogatories, Plaintiff will wish to depose all of the Defendants, together with several Defendants' witnesses. Plaintiff feels this can be accomplished within ninety days (90) from the receipt of Defendants' Answers to Interrogatories.

H. Do you wish this case to be tried
by a jury or non-jury?

I. Plaintiff requests jury
trial.

I. Not Applicable.



J. State with particularity the basis or reason for
bringing the action in the division in which it is filed.

At the time of the commission of the acts complained
of, all of the parties and the majority of the witnesses were
residents of Richland County, South Carolina. The acts
complained of were committed within the Columbia Division and
the convenience of the parties and the witnesses is most
suitable for trial in the Columbia Division.

BY: 

John O'Leary

Attorney for Plaintiffs


Columbia, S.C. 29201


September 28, 1989

CONF013193

VERIFICATION

The undersigned, [REDACTED] being first duly sworn, represents that he has read the foregoing Answers to Interrogatories pursuant to Rule 16(b) and knows the contents thereof; and that the allegations contained therein are true of his own knowledge, except as to those matters stated upon information and belief and as to those matters, he believes them to be true.

BY [REDACTED]

SWORN to before me this

17th day of October, 1989.

[Signature]
Notary Public for South Carolina

My commission expires: 1-14-96

United States District Court

Rec'd
10-26-89
J. Walker

DISTRICT OF
SOUTH CAROLINA
COLUMBIA DIVISION

[REDACTED]
a minor over the age of
fourteen years, and others similarly
situated,

SUMMONS IN A CIVIL ACTION

CASE NUMBER:

3 89-2540-6

V.
Indian Waters Council, Inc., Boy
Scouts of America, Inc., Karen Ellis,
Ralph Staten, unknown BEQ Battalion
Sergeant Major, unknown Brigade Sergeant
Major, unknown Brigade Commander of the
United States Army,

ORIGINAL FILED

OCT 18 1989

ANN A. BIRCH, CLERK
COLUMBIA, S. C.

TO: (Name and Address of Defendant)

[REDACTED]
Columbia, South Carolina 29201

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

John O'Leary
[REDACTED]
Columbia, South Carolina 29201-29202

Columbia, South Carolina 29201-29202

(20)
~~Twenty (20)~~
an answer to the complaint which is herewith served upon you, within 20 days after service of
this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken
against you for the relief demanded in the complaint.

ANN A. BIRCH

DATE

18 Oct 89

TK

[Signature]
BY DEPUTY CLERK

CONF013195

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ORIGINAL FILED

OCT 18 1989

ANN A. BIRCH, CLERK
COLUMBIA, S. C.

[REDACTED] legal)
guardian of [REDACTED])
a minor over the age of)
fourteen years, and others)
similarly situated,)

Plaintiffs,)

vs.)

Indian Waters Council, Inc.)
Boy Scouts of America, Inc.)
Karen Ellis, Ralph Staten,)
unknown BEQ Battallion)
Sergeant Major, Unknown)
Brigade Sergeant Major,)
Brigade Commander of the)
United States Army,)

Defendants.)

3 89-2540-6

COMPLAINT
NEGLIGENCE
PLAINTIFF REQUESTS
JURY TRIAL

THE Plaintiff, ABOVE-NAMED, complaining of the
Defendants would herein show into this Honorable Court:

FOR A FIRST CAUSE OF ACTION

(NEGLIGENCE)

1. That this action arises under the United States
Constitution, specifically the Fourth Amendment thereof.

2. That this court has jurisdiction of this cause and
the provisions of the United States Code, Title 28, §1331,
§1332, §1343 and §1441(c).

3. That the, Law, as modified by the Constitution and statutes of the sovereign state of South Carolina, is not inconsistent with the Constitution and laws of the United States and should be extended to govern this District Court of the United States in the trial and disposition of this cause, particularly with respect to such common law adoptions as negligence, contract, battery, privacy, emotional outrage and fraud, among others.

4. That the Plaintiff is a citizen and resident of the County of Richland, State of South Carolina, and is a minor over the age of fourteen years and brings this action by his legal guardian, [REDACTED].

5. That, upon information and belief, the Defendant Indian Waters Council, Inc., is a corporation duly organized and existing under the laws of the state of South Carolina and maintains offices and agents in the county and state aforesaid for the purpose of carrying on it's business.

6. That, upon information and belief, the Defendant Boy Scouts of America, Inc., is a corporation duly organized and existing under the laws of one of the states of the United States of America and maintains offices and agents in the county and state aforesaid for the purpose of carrying on it's business.

7. That at all times herein relevant, the Defendant, Ralph Staten, was a resident of the county and state aforesaid.

8. That the Defendants, Karen Ellis, unknown BEQ Batallion Sergeant Major, unknown Brigade Sergeant Major, and unknown Brigade Commander, were at all times here and relevant residents of the county and state aforesaid, and citizens and residents of the United States of America, and were acting under color and authority of the laws of the United States of America.

9. That at all times herein relevant the Defendant, Ralph Staten, was a scout master for and acting in that capacity and in the capacity of an agent and servant of the Defendants, Indian Waters Council, Inc., and The Boy Scouts of America, Inc, and was acting under the color and authority of the laws of the United States of America as a sergeant in the U.S. Army.

10. That at all times herein relevant, the Plaintiff, [REDACTED], was a minor entrusted by his parents to the care and control of each of the Defendants for moral nurture, recreation, edification, and safekeeping.

11. That at all times herein relevant each of the Defendants owed a special duty to the minor Plaintiff and stood in a fiduciary relationship, in loco parentis, to the minor Plaintiff.

12. That from on or about January, 1984, until on or about August, 1986, the Defendant, Ralph Staten, acting as the agent and servant of the other Defendants herein, did on several divers occasions take the minor Plaintiff and other young boys under Defendants' care on various scouting outings and activities. As a part of these activities sponsored by the Defendants, Plaintiff and others were encouraged to play together in the nude, photographs were taken of them in the nude, Plaintiff and others were shown sexually explicit magazines and movies, lotion was rubbed onto the Plaintiff and others while nude, by the Defendant Staten, said Defendant also rubbed and massaged the bottoms and the privates of the Plaintiff and others, pictures were drawn upon the bottoms of the Plaintiff and others, and a magic marker was inserted in their anuses.

13. That Defendants were careless, negligent, grossly negligent, wreckless, willfull and wanton in one or more of the following particulars:

- a. In encouraging, allowing and participating in activities which the Defendants knew or should have known would have been disapproved of by Plaintiff's parents;

12. That from on or about January, 1984, until on or about August, 1986, the Defendant, Ralph Staten, acting as the agent and servant of the other Defendants herein, did on several divers occasions take the minor Plaintiff and other young boys under Defendants' care on various scouting outings and activities. As a part of these activities sponsored by the Defendants, Plaintiff and others were encouraged to play together in the nude, photographs were taken of them in the nude, Plaintiff and others were shown sexually explicit magazines and movies, lotion was rubbed onto the Plaintiff and others while nude, by the Defendant Staten, said Defendant also rubbed and massaged the bottoms and the privates of the Plaintiff and others, pictures were drawn upon the bottoms of the Plaintiff and others, and a magic marker was inserted in their anuses.

13. That Defendants were careless, negligent, grossly negligent, wreckless, willfull and wanton in one or more of the following particulars:

- a. In encouraging, allowing and participating in activities which the Defendants knew or should have known would have been disapproved of by Plaintiff's parents;

- b. In failing to obtain the consent of Plaintiff's parents for any of these activities;
- c. In failing to inform the Plaintiff's parents of any of the aforesaid activities;
- d. In concealing said activities from Plaintiff's parents;
- e. In instructing, coercing, and threatening the Plaintiff from informing Plaintiff's parents of said activities;
- f. In allowing Plaintiff's involvement with said activities when Defendants knew, or should have known through the exercise of due diligence, these activities were dangerous to and likely to cause damage to the

Plaintiff's emotional and sexual development and health;

g. In that the Defendants either knew, or through the exercise of due diligence should have known, that these activities endangered and were calculated to do damage to the Plaintiff's moral development;

h. In that the Defendants knew or should have known that these activities were likely to cause present and future humiliation and embarrassment to the Plaintiff.

14. That as a direct result and consequence of the aforestated acts done by the Defendants or on their behalfs, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the

future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A SECOND CAUSE OF ACTION

(NEGLIGENCE)

15. That Plaintiff repeats and reiterates each and every allegation containing his preceeding causes of action as those said forth herein verbatim.

16. That the Defendant Indian Water Councils, Inc., and the Defendant Boy Scouts of America, Inc., were willful, wanton, wreckless, grossly negligent, negligent and careless in one or more of the following particulars:

- a. In failing to properly screen and select scout leaders with direct supervision over children including the Defendant Staten;

- b. In failing to properly train
boy scout leaders including
the Defendant Staten;
- c. In failing to provide proper
supervision of boy scout
leaders including the
Defendant Staten;
- d. In failing to have and
exercise proper review and
disciplinary procedures
concerning scout leaders
including the Defendant
Staten;
- e. In the retention of scout
leaders including the
Defendant Staten;
- f. In failing to remove the
Defendant Staten after
Defendants knew or should
have known of his problems
with alcohol and emotional
problems;

- g. In failing to exercise due diligence to discover Defendant Staten's sexual deviancy by psychological testing or the application of psychological profiles;
- h. In failing to provide adequate adult supervision during the scouting activities complained of above but not requiring the attendance or participation of at least two or more adults during such activities;
- i. In having should have known that scout leaders positions were attractive to sexual deviants and not providing notice to the Plaintiff or other scouts that scout leaders had no authority to allow or encourage certain activities;

j. In failing to inform Plaintiff or other scouts that they were encouraged to report such activities without fear of reprisal or embarrassment, anonymously if need be, and that they would be protected in doing so.

17. That as a direct result and consequence of the aforestated acts done by the Defendants or on their behalf, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A THIRD CAUSE OF ACTION

(NEGLIGENCE)

18. That Plaintiffs here and repeat and reiterate each and every allegation contained in their preceeding causes of actions as though said forth herein verbatim.

19. That Defendants, Karen Ellis, unknown BEQ Batallion Sergeant Major, unknown Brigade Sergeant Major, and unknown Brigade Commander, were willful, wanton, wreckless, grossly negligent, negligent and careless in one or more of the following particulars:

- a. In recommending and encouraging the Defendant Staten in scouting and other youth activities without proper screening;
- b. In failing to provide proper supervision of the Defendant Staten in his activities with boys under his supervision upon Fort Jackson;
- c. In failing to and exercise proper review and disciplinary procedure concerning the Defendant

Staten in his supervision
and conduct with boys on
Fort Jackson;

d. In the retention in the
United States Army of the
Defendant Staten;

e. In failing to remove the
Defendant Staten from youth
activities after the
Defendants knew or should
have known of his problems
with alcohol and emotional
problems;

f. In failing to exercise due
diligence to discovered
Defendant Staten's sexual
deviancy by psychological
testing or the application
of psychological profile;

g. In failing to provide
adequate adult supervision
during the scouting
activities complained of

above by not providing for the attendance or participation of at least two or more adults during such activities;

h. In having known that authority positions over minor children were attracted to sexual deviance and not providing notice to the Plaintiff or other persons under adult supervision at Fort Jackson that adult leaders had no authority to allow or encourage certain activities;

i. In failing to inform the Plaintiff or other youth under the supervision of the Defendant Staten that they were encouraged to report such activities as complained of without fear of reprisal or

embarrassment, anonymously if need be, and that they would be protected in doing so.

j. In failing to inspect the living quarters and activities of the Defendant Staten and in failing to supervise the Defendant Staten so as to discover his sexual deviancy and elicit activities conducted with minor children.

20. That as a direct result and consequence of the aforesated acts done by the Defendants or on their behalf, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A FOURTH CAUSE OF ACTION
(BREACH OF CONTRACT WITH FRAUDULENT INTENT)

21. Plaintiff here repeats and reiterates each and every allegation containing his preceeding causes of action as said forth in verbatim.

22. That Plaintiff's parents entered into an agreement and understanding with the Defendants herein, whereby they promise to pay certain fees and costs and to undertake certain obligations, and in return Defendants promised and undertook to enroll the Plaintiff herein, in their scouting program, and to provide services incident to Plaintiff's scout membership, Plaintiff being unstood and intended by both parties as the third party beneficiary to this agreement.

23. That among the considerations for this contract were the promises and undertakings and representations of the Defendants that they would provide safe, proper and non-harmful adult supervision of the Plaintiff while in their care, that Plaintiff would be provided with both activities and instruction which would be wholesome, character building, moral, and usefully instructive, and that Defendants would refrain from any activities reasonably calculated to be damaging to the Plaintiff in any way.

24. That the Defendants failed to perform their promises and undertakings aforesaid by conducting activities in a manner as heretoforeset forth above.

25. That accompanying the breach of the aforementioned contract, the Defendants committed fraudulent acts by attempting to conceal and prevent Plaintiff's parents from discovering these breaches.

26. That as a direct and proximate result of the Defendant's breach of the aforesaid contract, the Plaintiff has suffered grave emotional distress, public humiliation, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

27. That by reason of the fraudulent acts accompanying the breach of this contract by the Defendants, the Plaintiff is entitled to recover punitive damages of the Defendants.

FOR A FIFTH CAUSE OF ACTION

(BATTERY 1)

28. Plaintiff herein repeats and reiterates each and every allegation contained in his preceeding causes of action as though said forth here in verbatim.

29. That while under the care, guidance and supervision of all of the Defendants, the Defendant Staten did lay hands upon and rub the body of the Plaintiff as aforestated.

30. That the minor Plaintiff lacked capacity to consent thereto and this touching was offensive to Plaintiff's parents and beyond any authority given to the Defendants herein.

31. As a direct result and consequence of this battery upon the person of the Plaintiff, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A SIXTH CAUSE OF ACTION

(BATTERY 2)

32. Plaintiff herein repeats and reiterates each and every allegation contained in his preceeding causes of actions as though set forth herein verbatim.

33. That the Defendants did directly or through their agents insert a magic marker into the Plaintiff's anus.

34. That the Plaintiff lacked capacity to consent to this touching which was offensive to Plaintiff's parents and beyond any authority authorized by them.

35. That as a direct result and consequence of this battery, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A SEVENTH CAUSE OF ACTION

(INVASION OF PRIVACY)

36. Plaintiff herein repeats and reiterates each and every allegation containing his proceeding causes of action as though set forth herein verbatim.

37. That at all times herein relevant, the minor Plaintiff, through his parents and lawful guardians, had a reasonable expectation of privacy in his bodily orifices and sexual organs.

38. That this right to privacy was violated by the Defendants in one or more of the following manners:

- a. In viewing Plaintiff's person in the nude;
- b. In causing the Plaintiff to be seen nude by other persons;
- c. In touching Plaintiff's nude person;
- d. In causing Plaintiff to be seen by others being touched while nude;
- e. In inserting an object into Plaintiff's anus;

f. In causing Plaintiff to be seen having an object inserted into Plaintiff's anus;

g. In photographing the Plaintiff in the nude;

h. In viewing and causing others to view photographs of the Plaintiff in the nude.

39. That as a direct result and consequence, the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR AN EIGHTH CAUSE OF ACTION
(EMOTIONAL OUTRAGE)

40. Plaintiff herein repeats and reiterates each and every allegation contained in his preceding causes of action as though said forth herein verbatim.

41. That the acts forestated are so outrageous, offensive, dispicable and reprehensible as to violate the standards of conduct of civilized people and shock the conscious of a reasonable person.

42. That Defendants knew, or by the exercise of due diligence should have known, that these acts were likely to cause extreme and severe emotional stress and disturbance to the Plaintiff.

43. That as a direct result and consequence of the Defendant's negligent, grossly negligent, wreckless, willful and wanton actions the Plaintiff has suffered grave emotional distress, public humiliation and embarrassment, medical and psychological expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A NINTH CAUSE OF ACTION

(FRAUD)

44. Plaintiff herein repeats and reiterates each and every allegation contained in his preceeding causes of actions as said forth here in verbatim.

45. That Defendants did impliedly or explicitly represent unto the Plaintiff that the Defendant Staten did have the authority to allow and to require the Plaintiff to engage in activities not exclusive of those aforestated.

46. That this representation was false, Plaintiff's parents have given no such authority, and this was known by the Defendants to be false.

47. That it was the intention of the Defendants that the Defendant Staten have the apparent authority to allow, authorize or require such actions, as he might.

48. That because of Plaintiff's youth, naivety and lack of capacity, he was ignorant of the falsity of this apparent authority and relied there upon to his detriment.

49. That as a direct and result consequence of this reliance the Plaintiff suffered grave emotional distress, public humiliation and embarrassment, medical and psychological

expenses, loss of self-esteem, physical pain and suffering, loss of standing among his friends and community, and that in the future, upon information and belief, the Plaintiff will suffer additional emotional distress, humiliation and embarrassment, medical and psychological expenses, reduced wages, reduced earning ability, injury to standing among friends and community, and will suffer permanent mental and emotional impairment and disability.

FOR A TENTH CAUSE OF ACTION
(VIOLATION OF CIVIL RIGHTS)

50. Plaintiffs herein repeat and reiterate each and every allegation contained in their preceeding causes of action as though said forth herein verbatim.

51. That the Defendants, Ralph Staten, Karen Ellis, unknown BEQ Batallion Sergeant Major, unknown Brigade Sergeant Major, unknown Brigade Commander, did commit the acts complained of above under the color and authority of the laws of the United States of America and did jointly and severly cause the Plaintiff to be violated in his rights under the Fourth Amendment of the United States Constitution to be secure in his person against unreasonable searches and seizures, and did deny his rights under the Fifth Amendment of the United States Constitution to not be deprived of liberty or property without due process of law.

October 27, 1989



No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Francis H. Herndon
President
Ted Schmidt
Commissioner
James C. Dalton
Scout Executive

Mr. Paul Ernst
Director
Registration and Fulfillment Service
Boy Scouts of America
P. O. Box 152079
Irving, Texas 75015-2079

Dear Paul,

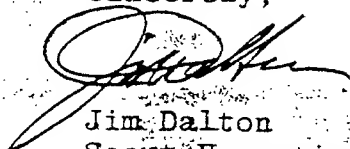
On Thursday, October 26th, I was delivered the attached civil action summons. This civil case results from a previous military charge and conviction of Ralph R. Staten, Fort Jackson, S. C.

We previously mailed the complete volume of the court proceedings to your office in 1986. I am enclosing copies of initial documents contained in our file reference to this case.

Please contact me and provide any support direction you feel I need to pursue. I have given a copy of the summons to our attorney James C. Leventis, [REDACTED] Columbia, S. C. 29211 for his review and suggestions.

Thank you for your attention.

Sincerely,


Jim Dalton
Scout Executive

JD:kh

Enclosure



United Way - Serving Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013220

August 18, 1987

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL AND CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

Thank you for the detailed information sent concerning the above Scouter. This case has been reviewed with our attorney and is now on our permanent Confidential File.

Sincerely,

Paul Ernst, Director
Registration Service

PE/mdw

cc: Southeast Region

READY TO FILE
AUG 19 1987
ERIN O'RILEY

CONF013221



James C. Dalton
Scout Executive

Indian Waters Council
Boy Scouts of America
P.O. Box 144
Columbia, S.C. 29202

318 Challedon Ct.
Columbia, S.C. 29210

June 30, 1987

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Randolph Staten

Dear Jim:

Thank you very much for sending us the Confidential Record Sheet for the above-named individual. This is most helpful to us and will give us all the information necessary for identifying him should he attempt to register in some other location at a later time.

If you feel there is any other information which I should have to complete our file, please do not hesitate to send it. Otherwise, I feel we have the necessary information for refusal of any later registration attempts.

Please let me know if I may be of help to you in any other way.

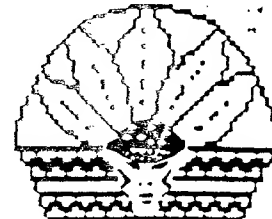
Sincerely,

Paul Ernst, Director
Registration & Subscription Service

PE/cre

cc: Southeast Region

CONF013222



**INDIAN
WATERS
COUNCIL**

No. 553

Boy Scouts of America

1825 Gadsden Street

P.O. Box 144

Columbia, South Carolina 29202

Jack W. Montgomery
President

Harold J. Talbert
Commissioner

James C. Dalton
Scout Executive

June 22, 1987

Office of the Staff Judge Advocate
ATTN: CPT Cargill
Fort Jackson, SC 29207

Dear Capt. Cargill:

Pursuant to the Freedom of Information Act, we request a trial transcript of the trial related to Staff Sergeant Ralph Staten. The trial took place at Fort Jackson on or about January 9, 10, 11, 1987. We would appreciate receiving the transcript at the earliest possible date.

We are willing to pay all search and reproduction costs for the transcript. However, being a non-profit organization, we request a waiver of the fees.

Please mail the transcript to my attention at the above address, marked "Personal and Confidential."

Thank you.

Sincerely,

Thomas J. Howard, Sr.
Wateree River District Executive



United Way Serving: Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013223



SCOUTING/USA

National Office
BOY SCOUTS OF AMERICA

[Redacted] Irving, Texas 75038-3096

June 4, 1987

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No.

PERSONAL & CONFIDENTIAL

Ralph Staten

Dear Jim:

We are again following up with you concerning the above-named individual. I am enclosing another Confidential Record Sheet which I would like to have completed so we may identify Mr. Staten should he try to register in some other council.

We would also like to know the outcome of the action against him so that we have a complete file for future use.

Thank you for your help.

Sincerely,

Paul Ernst, Director
Registration & Subscription Service

eak

Encl.

cc: Southeast Region

CONF013224

March 6, 1987

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

This is another follow-up concerning the above-named individual. We have not received a Confidential Record Sheet for Mr. Staten and I am enclosing another one for your use. We really need this information so that we may identify Mr. Staten should he attempt to register in some other location.

I would also like to have the outcome of any legal action if this has now taken place. This will certainly strengthen our file and enable us to refuse registration and protect the youth registered with the Boy Scouts of America.

Let us know if we may be of any help to you.

Sincerely,

Paul Ernst, Director
Registration, Subscription &
Statistical Service

eak

Encl.

cc: Southeast Region

553-50358
011838

deleted from
Registration file
3-12-87
CWD

MAR 9 1987

MAR 9 1987

SHIRLEY MEYER

CONF013225

BOY SCOUTS OF AMERICA

DATE January 14, 1987FULL NAME Ralph Randolph Staten SOCIAL SECURITY NUMBER [REDACTED]
(No initials if you can possibly get full name)Home of Record
ADDRESS _____CITY Baltimore STATE MD ZIP CODE _____DATE OF BIRTH Sept. 16, 1952 (This is important and should be exact)APPROXIMATE AGE 35-38 (To be used ONLY when date of birth is not known)RELIGION Roman Catholic NATIONALITY AmericanOCCUPATION Professional SoldierEDUCATION Mervin Tec High School, N.D. - GraduateWEIGHT 6' + HEIGHT _____ RACE NegroCOLOR OF HAIR Black COLOR OF EYES _____OUTSTANDING CHARACTERISTICS OR INTERESTS thin mustache, light skinned Volunteer as
soccer coach 11/82 baseball, basketballMARRIED OR SINGLE Single CHILDREN _____
(Number, ages, and names, if possible)

NAME OF SPOUSE _____

SCOUTING CONNECTIONS:

UNIT #	CITY	STATE	POSITION	DATE REGISTERED	DATE RESIGNED
388	Columbia	SC	SM	1983	
	Ft Hood	TX		1977, 1979	
	Giessen (?)	Germany		1976-77, 1978-79, 1980-1983	

SPECIAL RECOGNITION 1984 - TRADOC - Outstanding Volunteer. Many others 1-17-80 / 1-10-83
for various sports, each season

SUSPENDED OR DENIED REGISTRATION FOR FOLLOWING REASONS:

SPECIFY THE FACTS WHICH LEAD YOU TO RECOMMEND DENIAL OF REGISTRATION AND LIST ATTACHED SUPPORTING DOCUMENTS (STATE ONLY KNOWN FACTS, NOT RUMOR, CONJECTURE OR SPECULATION):

Signed _____
SCOUT EXECUTIVE

Council _____



SCOUTING/USA

National Office
BOY SCOUTS OF AMERICA

1225 Walnut Hill Lane, Irving, Texas 75038-3096

December 17, 1986

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

This is just a follow-up on the above-named individual. This is done as files come to the top of the pile so that we can make certain that we eventually get all of the material necessary for refusing registration attempts which could take place.

I am enclosing another Confidential Record Sheet, which I would like to have completed, which would identify Mr. Staten should he attempt to register anywhere else.

If we may be of help in any other way, please do not hesitate to contact us.

Sincerely,

Paul Ernst, Director
Registration, Subscription &
Statistical Service

eak

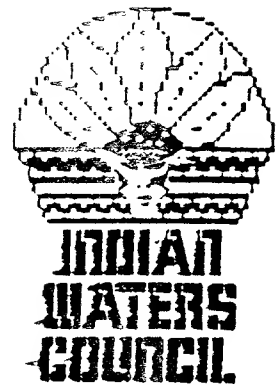
Encl.

cc: Southeast Region

See Attached
[Signature]

CONF013227

October 17, 1986



No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202
Telephone 765-9070
Jack W. Montgomery
President
Harold J. Talbert
Commissioner
James C. Dalton
Scout Executive

Mr. Paul Ernst
Director of Registration Service
Boy Scouts of America
1325 Walnut Hill Lane
Irving, Texas 75038-3096

Dear Paul,

Attached you will find two newspaper articles that appeared in the October 9th issue of the morning and evening editions of the Columbia newspapers.

Ralph Staten was the Scoutmaster of Troop 388, sponsored by Windsor United Methodist Church of Columbia, S. C. I have followed the instructions outlined in the "Procedures for Maintaining Standards of Leadership." A letter (copy attached) has been delivered, as advised, and properly recorded. I have met with the Pastor of the church and the troop committee, and I am pleased to inform you that proper procedures were followed initially when Staten was selected as Scoutmaster. He had full approval of the church and the committee, including the Pastor, Reverend Richard Allen.

I have personally met with the committee on two occasions. Interim leadership has been established and the official board of the church voted to continue sponsorship. The committee is currently working to secure a new Scoutmaster with the leadership of the Scouting Coordinator appointed by the church.

At this date, Ralph Staten has not been charged. The investigating officer at Fort Jackson informs me that charges pending are "sexual misconduct" involving nude photographs of 5 Scouts and assorted pornographic literature and videos.



United Way Serving: Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013228

Mr. Paul Ernst

2

October 17, 1986

I will keep you informed as we learn more from authorities at Fort Jackson. Your advice and support is greatly appreciated.

Sincerely,

Jim Dalton
Scout Executive

JD:kh

Encl.

CONF013229

Sergeant arrested at fort, but no charges are filed

From Staff Reports

Fort Jackson authorities are investigating allegations of sexual abuse of Boy Scouts by a sergeant stationed at the U.S. Army base.

Staff Sgt. Ralph Stalen, 33, has been arrested and is under restriction at the post. "We expect, as a result of the investigation,

charges may be filed," post spokesman Lt. Col. Larry Seals said Wednesday.

The charges involve as many as five members of a Boy Scout troop at a Dentonville church. The boys range in age from 12 to 14.

Most of the boys are children of parents connected to the military, although one is believed to be the son of a civilian.

Seals said he couldn't provide more specific information about the charges, but said the incidents are alleged to have occurred

during August of this year and possibly began in 1984.

Stalen has not been formally charged, but he is under arrest at the fort, and "his movements are controlled and observed," Seals said.

The case is being handled by the Army's Criminal Investigation Division.

Stalen is a 12-year Army veteran from Baltimore. He has been stationed at Fort Jackson for three years.

4-D THE COLUMBIA RECORD

Thursday, October 9, 1986

Fort Jackson sergeant arrested in sexual abuse investigation

A sergeant at Fort Jackson is under investigation in connection with allegations that he sexually abused members of a local Boy Scout troop.

Staff Sgt. Ralph Stalen, 33, has not been formally charged, but he has been arrested, informed of his rights, questioned and placed under restriction at the post, according to Lt. Col. Larry Seals, post spokesman.

"We expect, as a result of the investigation, that charges may be preferred," Seals said. "Because of the nature of the allegations of the conduct involved, if charges are preferred, they may be preferred to a general court-martial."

Stalen is being represented by defense lawyers in the Fort Jackson legal office. "I have spoken to the senior defense attorney, and he has indicated that neither he nor Sgt. Stalen wants to make a statement at this time," Seals said today.

Seals said the investigation has identified five possible victims, all

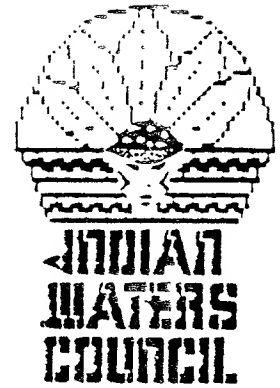
members of a Boy Scout troop at a Dentonville church. The boys range in age from 12 to 14.

Most of the boys are children of parents with connections to the military, but Seals said not all of the possible victims are military-related. He said some of the incidents are alleged to have occurred at Fort Jackson. He said incidents are alleged to have occurred in August and possibly began in 1984.

Seals said the Army's Criminal Investigation Division is interviewing the boys in the presence of family members. "We want to ensure that trauma to the victims and the victims' families is minimized," he said. Stalen is under restriction at Fort Jackson and his movements are controlled and observed, Seals said. He said a military magistrate refused to require pretrial confinement.

Stalen is a 12-year Army veteran from Baltimore. He has been stationed at Fort Jackson for three years.

October 10, 1986



No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Jack W. Montgomery
President
Harold J. Talbert
Commissioner
James C. Dalton
Scout Executive

Dear Executive Committee Member:

You may be aware of recent publicity involving Staff Sgt. Ralph Staten at Fort Jackson, who is under investigation in connection with allegations that he sexually abused members of a local Boy Scout Troop. I have been in contact with the Office of Criminal Investigation at Fort Jackson and informed that the charges pending are sexual misconduct. This offense implies the relationship of influencing minors through pornography and there is no evidence of acts of sodomy involved in this case.

Staten is being represented by defense lawyers in the Fort Jackson legal office. The investigation has identified five possible victims, all who have been mentioned as members of Troop 388 of [REDACTED] Church in the Dentsville area.

I recently met with officials of the church, and they have voted to continue sponsorship of the Troop. Interim leadership has been appointed and the Troop Committee has initiated a plan to select new leadership to replace Staten as Scoutmaster.

He has been informed personally that his registration with the Boy Scouts of America has been suspended.

As a member of the Executive Committee, we feel you need to be informed of the nature of this incident. If you have other questions, please feel free to discuss this issue in more detail.

Sincerely,

Jim Dalton
Scout Executive

JD:kh



United Way Serving America, Bermuda, Canada, England, Germany, Hong Kong, India, Japan, Korea, Mexico, New Zealand, Norway, Philippines, Puerto Rico, Saudi Arabia, South Africa, Taiwan, Thailand, United Kingdom, United States, and Venezuela

CONF013231

September 5, 1986



No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Jack W. Montgomery
President

Harold J. Talbert
Commissioner

James C. Dalton
Scout Executive

Mr. Ralph R. Staten

Fort Jackson, S. C. 29207

Dear Mr. Staten:

After careful review, we have decided that your registration with the Boy Scouts of America should be suspended. We are therefore compelled to request that you sever any relations that you may have with the Boy Scouts of America.

You should understand that BSA leadership registration is a privilege and is not automatically granted to everyone who applies. We reserve the right to suspend registration whenever there is a concern that an individual may not measure up to the high standards of leadership which the BSA seeks to provide for American youth. Please also understand that this decision and the reasons for it will be maintained as confidential.

If you wish to have this decision reviewed, please write to me, explaining your version of the facts supporting your claim that your registration as a BSA leader should be granted or reinstated.

Sincerely yours,

Jack Montgomery
Jack Montgomery
Council President

JM:kh

*Personally delivered 10/10/86 to
Ralph Staten - by Jim Dalton
Scout Executive
Witnessed by - Captain Jim Hunter*



United Way

Serving: Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013232

October 24, 1986

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

Thanks so much for your letter of October 17th concerning the above-named individual. This material is most helpful to us and will enable us to set up a file to start the proceedings which are necessary for future refusal. I appreciate your help and look forward to hearing from you as more information is gathered.

I am enclosing a Confidential Record Sheet which I would like to have completed, so that we may be able to easily identify Mr. Staten should he be able to move to another location and attempt to register. Thanks for your help in protecting the youth of America.

Sincerely,

Paul Ernst, Director
Registration, Subscription &
Statistical Service

PE/cre

Enclosure

cc: Southeast Region

READY FOR FILE

OCT 27 1986

SHIRLEY MEYER

CONF013233

October 17, 1986



INDIAN WATERS COUNCIL

No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Jack W. Montgomery
President

Harold J. Talbert
Commissioner

James C. Dalton
Scout Executive

Mr. Paul Ernst
Director of Registration Service
Boy Scouts of America
1325 Walnut Hill Lane
Irving, Texas 75038-3096

Dear Paul,

Attached you will find two newspaper articles that appeared in the October 9th issue of the morning and evening editions of the Columbia newspapers.

Ralph Staten was the Scoutmaster of Troop 388, sponsored by [REDACTED] Church of Columbia, S. C. I have followed the instructions outlined in the "Procedures for Maintaining Standards of Leadership." A letter (copy attached) has been delivered, as advised, and properly recorded. I have met with the Pastor of the church and the troop committee, and I am pleased to inform you that proper procedures were followed initially when Staten was selected as Scoutmaster. He had full approval of the church and the committee, including the Pastor, Reverend Richard Allen.

I have personally met with the committee on two occasions. Interim leadership has been established and the official board of the church voted to continue sponsorship. The committee is currently working to secure a new Scoutmaster with the leadership of the Scouting Coordinator appointed by the church.

At this date, Ralph Staten has not been charged. The investigating officer at Fort Jackson informs me that charges pending are "sexual misconduct" involving nude photographs of 5 Scouts and assorted pornographic literature and videos.

F. STARON

OCT 20 1986



United Way Serving: Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013234

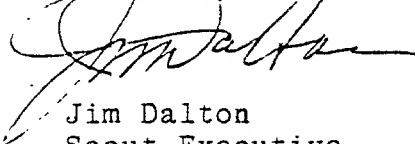
Mr. Paul Ernst

2

October 17, 1986

I will keep you informed as we learn more from authorities at Fort Jackson. Your advice and support is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Dalton", written over a horizontal line.

Jim Dalton
Scout Executive

JD:kh

Encl.

CONF013235

FAMILY INVESTIGATES SEX ABUSE CHARGES

Sergeant arrested at fort, but no charges are filed

From Staff Reports

Fort Jackson authorities are investigating allegations of sexual abuse of Boy Scouts by a sergeant stationed at the U.S. Army base.

Staff Sgt. Ralph Staten, 33, has been arrested and is under restriction at the post. "We expect, as a result of the investiga-

tion, charges may be filed," post spokesman Lt. Col. Larry Seals said Wednesday.

The charges involve as many as five members of a Boy Scout troop at a Dentsville church. The boys range in age from 12 to 14.

Most of the boys are children of parents connected to the millitary, although one is believed to be the son of a civilian.

Seals said he couldn't provide more specific information about the charges, but said the incidents are alleged to have occurred

during August of this year and possibly began in 1984.

Staten has not been formally charged, but he is under arrest at the fort, and "his movements are controlled and observed," Seals said.

The case is being handled by the Army's Criminal Investigation Division.

Staten is a 12-year Army veteran from Baltimore. He has been stationed at Fort Jackson for three years.

4-D THE COLUMBIA RECORD

Thursday, October 9, 1986

Fort Jackson sergeant arrested in sexual abuse investigation

A sergeant at Fort Jackson is under investigation in connection with allegations that he sexually abused members of a local Boy Scout troop.

Staff Sgt. Ralph Staten, 33, has not been formally charged, but he has been arrested, informed of his rights, questioned and placed under restriction at the post, according to Lt. Col. Larry Seals, post spokesman.

"We expect, as a result of the investigation, that charges may be preferred," Seals said. "Because of the nature of the allegations of the conduct involved, if charges are preferred, they may be preferred to a general court-martial."

Staten is being represented by defense lawyers in the Fort Jackson legal office. "I have spoken to the senior defense attorney, and he has indicated that neither he nor Sgt. Staten wants to make a statement at this time," Seals said today.

Seals said the investigation has identified five possible victims, all

members of a Boy Scout troop at a Dentsville church. The boys range in age from 12 to 14.

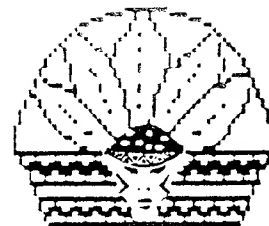
Most of the boys are children of parents with connections to the millitary, but Seals said not all of the possible victims are millitary-related. He said some of the incidents are alleged to have occurred at Fort Jackson. He said incidents are alleged to have occurred in August and possibly began in 1984.

Seals said the Army's Criminal Investigation Division is interviewing the boys in the presence of family members. "We want to ensure that trauma to the victims and the victims' families is minimized," he said.

Staten is under restriction at Fort Jackson and his movements are controlled and observed, Seals said. He said a millitary magistrate refused to require pretrial confinement.

Staten is a 12-year Army veteran from Baltimore. He has been stationed at Fort Jackson for three years.

October 10, 1986



**INDIAN
WATERS
COUNCIL**

No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Jack W. Montgomery
President.

Harold J. Talbert
Commissioner

James C. Dalton
Scout Executive

Dear Executive Committee Member:

You may be aware of recent publicity involving Staff Sgt. Ralph Staten at Fort Jackson, who is under investigation in connection with allegations that he sexually abused members of a local Boy Scout Troop. I have been in contact with the Office of Criminal Investigation at Fort Jackson and informed that the charges pending are sexual misconduct. This offense implies the relationship of influencing minors through pornography and there is no evidence of acts of sodomy involved in this case.

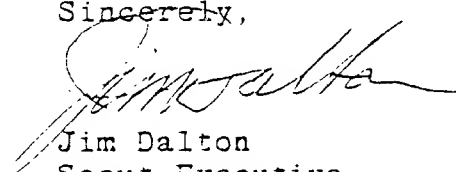
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I recently met with officials of the church, and they have voted to continue sponsorship of the Troop. Interim leadership has been appointed and the Troop Committee has initiated a plan to select new leadership to replace Staten as Scoutmaster.

He has been informed personally that his registration with the Boy Scouts of America has been suspended.

As a member of the Executive Committee, we feel you need to be informed of the nature of this incident. If you have other questions, please feel free to discuss this issue in more detail.

Sincerely,


Jim Dalton
Scout Executive

JD:kh



United Way Serving Barnberg, Barnwell Calhoun, Fairfield, Kershaw Lexington, Orangeburg, Richland and Saluda Counties

CONF013237

September 5, 1986



No. 553
Boy Scouts of America
1825 Gadsden Street
P.O. Box 144
Columbia, South Carolina 29202

Jack W. Montgomery
President

Harold J. Talbert
Commissioner

James C. Dalton
Scout Executive

Mr. Ralph R. Staten

Fort Jackson, S. C. 29207

Dear Mr. Staten:

After careful review, we have decided that your registration with the Boy Scouts of America should be suspended. We are therefore compelled to request that you sever any relations that you may have with the Boy Scouts of America.

You should understand that BSA leadership registration is a privilege and is not automatically granted to everyone who applies. We reserve the right to suspend registration whenever there is a concern that an individual may not measure up to the high standards of leadership which the BSA seeks to provide for American youth. Please also understand that this decision and the reasons for it will be maintained as confidential.

If you wish to have this decision reviewed, please write to me, explaining your version of the facts supporting your claim that your registration as a BSA leader should be granted or reinstated.

Sincerely yours,

Jack Montgomery
Jack Montgomery
Council President

JM:kh

*Personally delivered 10/10/86 to
Ralph Staten - by Jim Dalton
Scout Executive
Witnessed by - Captain Jim Gunther*



United Way Serving: Bamberg, Barnwell, Calhoun, Fairfield, Kershaw, Lexington, Orangeburg, Richland and Saluda Counties

CONF013238

SCOUTING

CA

8-3096

December

Mr. James
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

This is just a follow-up on the above-named individual. This is done as files come to the top of the pile so that we can make certain that we eventually get all of the material necessary for refusing registration attempts which could take place.

I am enclosing another Confidential Record Sheet, which I would like to have completed, which would identify Mr. Staten should he attempt to register anywhere else.

If we may be of help in any other way, please do not hesitate to contact us.

Sincerely,



Paul Ernst, Director
Registration, Subscription &
Statistical Service

eak

Encl.

cc: Southeast Region

CPT Randy
Cargill
Pres.
— STA —
MSG Walter
Lawson
Chief Admin

CONF013239

December 17, 1986

Mr. James C. Dalton
Scout Executive
Indian Waters Council, No. 553

PERSONAL & CONFIDENTIAL

SUBJECT: Ralph Staten

Dear Jim:

This is just a follow-up on the above-named individual. This is done as files come to the top of the pile so that we can make certain that we eventually get all of the material necessary for refusing registration attempts which could take place.

I am enclosing another Confidential Record Sheet, which I would like to have completed, which would identify Mr. Staten should he attempt to register anywhere else.

If we may be of help in any other way, please do not hesitate to contact us.

Sincerely,

Paul Ernst, Director
Registration, Subscription &
Statistical Service

eak

Encl.

cc: Southeast Region

READY FOR FILE

DEC 17 1986

SHIRLEY MEYER

CONF013240